

Vann, Bradley

From: Drustrup, Bob [DNR] [Bob.Dustrup@dnr.iowa.gov]
Sent: Wednesday, July 03, 2013 7:36 AM
To: Vann, Bradley; Scott.Heemstra@vogelpaint.com; Keith Delange; Lundberg, Cal [DNR]
Subject: Follow-up to Monday's meeting at the Vogel site

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The meeting Monday at the Vogel Paint & Wax Superfund site south of Maurice, Iowa was attended by: Brad Vann (EPA), Scott Heemstra (Vogel), Keith Delange (Geotek), Tom Chap (formerly Geotek), Cal Lundberg (DNR) and Bob Drustrup(DNR). Below is a list of the items that came out of the meeting.

1. The recent unexpected detection of higher concentrations of contaminants in the off-site monitoring well is likely an artifact of last year's drought. Monthly sampling of the off-site wells will be conducted to confirm this. (I don't think we specifically discussed this at the meeting, but I'm suggesting monthly monitoring of the off-site wells GMW-7R, GMW-20, GMW-21, GMW-25, and GMW-30 with a return to semi-annual sampling after 3 months of stable or improving conditions and no MCL violations in the southern-most wells.)
2. Continued semi-annual sampling with more comprehensive annual sampling until the 2014 Superfund Five-Year Review(FYR) is completed. Vogel may request changes in the monitoring program prior to the FYR.
3. The recommended items from the 2009 FYR either have been completed or a scheduled to be completed (e.g., tree core sampling scheduled for this Summer, environmental covenant for the site).
4. The likely fate of groundwater leaving the Vogel site is to the Floyd River southeast of the site or to the small stream about 1 mile south of the site. There are no existing or anticipated groundwater uses within the likely area of the groundwater downgradient of the Vogel Site. Natural attenuation is expected to reduce contaminants to below drinking water standards within a short distance of the area where contamination has been found.
5. The proposed environmental covenant will adequately address on-site groundwater concerns. An environmental covenant (EC) of the property immediately south of the site would be desirable, but if an off-site EC proves difficult, a viable alternative form of institutional control may be an annual notification to the county water permitting authority and periodic inspection (e.g., quarterly) to ensure a well has not been installed within say a mile downgradient of the site.
6. Continue monthly free-product recovery actions until the next Superfund FYR. Vogel may propose modification of cessation of this activity prior to the FYR.
7. Continued annual report with and submittal of semi-annual monitoring results with possible changes after 2014 FYR.
8. The consent order between Vogel and DNR should be updated to better reflect the current and expected conditions, probably after the 2014 Superfund FYR.
9. There may not be a need for a Superfund ROD amendment or Explanation of Significant Differences. Brad Vann will check with EPA attorneys to confirm.
10. Potential long-term activities at the site may include:
 - Periodic groundwater monitoring at a small number of monitoring wells.
 - Reducing monitoring frequency from semi-annual currently to annually and eventually to be once every five years concurrent with FYRs.
 - Annual confirmation of no off-site groundwater use and reminder to the county well-permitting authority.
 - Likely discontinued free product recovery.
 - Requirements, if any, to deal with contaminants in tree waste.

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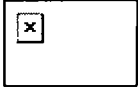
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- Contingencies in the event of unforeseen conditions, such as testing of any new well within a mile downgradient of the Vogel Site and increased monitoring frequency for an unexpected increase in off-site contaminant levels.

I've elaborated on a few items discussed above beyond what we discussed, so please review and comment as you see fit.

BOB DRUSTRUP Environmental Engineer



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